

BEFORE THE

Federal Communications Commission

WASHINGTON, D. C. 20554

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OCT - 9 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
AMENDMENT OF SECTION 73.202(b),)	MM Docket No.
Table of FM Allotments)	RM No.
(Eatonville and Aberdeen, Washington))	

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Barbara J. Geesman ("Geesman"), licensee of Station KKBY-FM, Eatonville, Washington, herein requests that Table of FM Allotments, Section 73.202(b) of the Commission's Rules, be amended to substitute Channel 284C3 for Channel 285A at Eatonville, Washington, and that the license of KKBY-FM be modified to specify operation on the higher class channel. In support of this request, the following is stated:

1. Geesman seeks to upgrade the allotment for KKBY-FM, Eatonville, Washington, in order to expand the area served by the station and to make a more efficient use of the broadcast spectrum. As set forth in the attached engineering statement of Michael Celenza, with the proposed upgraded allotment, KKBY-FM will be able to serve four time the number of persons it can with its Class A facilities. In order to substitute Channel 284C3 for Channel 285A, a special reference point, N 47-05-46, W 122-12-53, is proposed. As indicated in Mr.

Celenza's statement, KKBY-FM operating from those coordinates would still be able to place a city-grade contour over Eatonville.

2. In order to accommodate the upgrade of Station KKBY-FM, Geesman further requests that Channel 285C2 be substituted for Channel 284C2 at Aberdeen, Washington and that the license of Station KDUX-FM be modified to specify operation on the new channel. The channel substitution at Aberdeen would not require a change in the KDUX-FM transmitter site. See Exhibit 1 of Mr. Celenza's engineering statement.

3. Thus, Geesman proposes the FM Table of Allotments be amended as follows:

<u>Community</u>	<u>Present Allotment</u>	<u>Proposed Allotment</u>
Eatonville, Washington	285A	284C3
Aberdeen, Washington	257C1, 284C2	257C1, 285C2

4. This arrangement would result in a preferable allotment scheme in that KKBY-FM would be able to serve a far greater number of persons and provide better service to its current listeners. At the same time, Station KDUX-FM would receive an equivalent class channel and its ability to serve the public would remain unchanged. As set forth in the attached engineering statement, the proposed allotments can be made in compliance with the Commission's spacing requirements.

WHEREFORE, in light of the foregoing, Barbara J. Geesman respectfully requests the FM Table of Allotments be amended as set forth above.

BARBARA J. GEESMAN

By 

Matthew H. McCormick
Her Counsel

Reddy, Begley & McCormick
2175 K Street, N.W., Suite 350
Washington, D.C. 20037
(202) 659-5700

October 9, 1997

ENGINEERING STATEMENT
IN SUPPORT OF AN AMENDMENT
TO SECTION 73.202(b)
OF THE FCC RULES
TO EXCHANGE THE FREQUENCIES
OF KKBY 104.9 FM
CHANNEL 285A EATONVILLE, WASHINGTON
WITH KDUX 104.7 FM
CHANNEL 284C2 ABERDEEN, WASHINGTON
AND UPGRADE KKBY FM
TO A CLASS C3
SEPTEMBER 24, 1997

MICHAEL CELENZA COMMUNICATIONS
40 Grohmans Lane
Plainview, New York 11803
(516) 681-0878

ENGINEERING STATEMENT
IN SUPPORT OF AN AMENDMENT
TO SECTION 73.202 (b)
OF THE FCC RULES
TO EXCHANGE THE FREQUENCIES
OF KKBY 104.7 FM
CHANNEL 285A EATONVILLE, WASHINGTON
WITH KDUX 104.7 FM
CHANNEL 284C2 ABERDEEN, WASHINGTON
AND UPGRADE KKBY FM
TO A CLASS C3
SUMMARY

The following engineering statement has been prepared on behalf of Mrs. Barbara Geesman-Chase, President of KKBY FM. Mrs. Barbara Geesman-Chase is proposing a class upgrade for KKBY FM channel 285A, to become a class C3. The following will show how Geesman-Chase proposes to go about the upgrade.

This can be done by exchanging frequencies with KDUX FM channel 284C2 Aberdeen, Washington. By exchanging these frequencies, KDUX will be able to continue to use their transmitter site (46-56-00 N) (123-43-49 W). Also power levels of a class C2 would remain unchanged. The only requirements would be for them to move from channel 284C2 to channel 285C2. An allocation study was performed and shown herein exhibit # 1, meeting F.C.C. 73.207 distance requirements.

MICHAEL CELENZA COMMUNICATIONS

By allowing the change of frequencies KKBY Radio will be able to upgrade their power levels to a class C3, which in return will create a better use of the FM Broadcast Spectrum. The following requirements would be that KKBY relocate their transmitter location to the North East by 28.6 km (N 47-05-46) (W 122-12-53). Exhibit # 2 allocation study showing clearance for channel 284C3 would meet 73.207 of the F.C.C rules. Exhibit # 3 will show city of license coverage contour map.

PROPOSED AMENDMENTS TO TABLE OF ALLOTMENTS

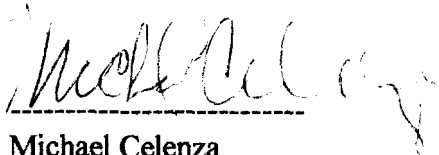
<u>COMMUNITY</u>	<u>PRESENT</u>	<u>PROPOSED CHANNEL</u>	<u>PRESENT COORDINATES</u>	<u>PROPOSED</u>
EATONVILLE WASHINGTON	285A	284C3	46-50-24 122-15-27	47-05-46 122-12-53
ABERDEEN WASHINGTON	284C2	285C2	46-56-00 123-43-49	46-56-00 123-43-49

CONCLUSION

The proposed amendments to the FM Table of Allotments will:

- 1- By using the new transmitter site it will allow KKBY FM to upgrade it's power level to a C3 status which will result in a more efficient use of the FM spectrum.
- 2- KKBY FM will provide more services to a significant area, and population. The population will be increased by four times greater than it's current Class A licensed power.

The forgoing has been prepared on behalf of Mrs. Barbara J. Geesman by
Michael Celenza Communications, 40 Grohmans Lane, Plainview N.Y. 11803.
The statements herein are true and correct of my knowledge, for any concerns on
engineering amendments please contact the undersigned.

A handwritten signature in cursive script, appearing to read "Michael Celenza", is written over a horizontal dashed line.

Michael Celenza
September 24, 1997

Michael Celenza Communications
40 Grohmans Lane
Plainview, N.Y. 11803
(516) 681-0878

Michael Celenza
Communications
FM Separation Study

EXHIBIT I
Separation Buffer: 160 KM
Coordinates
46-56-00N 123-43-49W

Job Title: Barbara Geesman
Channel : 285C2 (104.9 mhz)

Searching Channel 285C2 (104.9 MHz), from the site of KDUX:

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Tillamook	OR	231	A	V	164.7	14.0	185.0°	150.7
NEW	Tillamook	OR	231	A	A	164.7	14.0	185.0°	150.7
ALC	Seattle	WA	231	C	U	147.3	35.0	64.5°	112.3
KMP5FM	Seattle	WA	231	C	L	147.3	35.0	64.5°	112.3
ALC	Long Beach	WA	232	A	U	73.1	14.0	199.7°	59.1
KKEE	Long Beach	WA	232	A	L	73.1	14.0	199.7°	59.1
ALC	Tillamook	OR	282	C1	V	163.7	79.0	185.1°	84.7
KTILFM	Tillamook	OR	282	C1	A	163.7	79.0	185.1°	84.7
ALC	Chehalis	WA	282	A	A	66.3	55.0	118.4°	11.3
ALC	Bellingham	WA	282	C	U	205.3	105.0	19.0°	100.3
K282AB	Chehalis	WA	282	D	L	69.2	0.0	121.1°	69.2
KAFE	Bellingham	WA	282	C	L	205.3	105.0	19.0°	100.3
NEW-T	Woodland	WA	282	D	A	138.4	0.0	145.5°	138.4
ALC	The Dalles	OR	283	C	U	242.7	105.0	124.0°	137.7
KMCQ	The Dalles	OR	283	C	L	242.7	105.0	124.0°	137.7
KMIH	Mercer Island	WA	283	D	L	134.9	0.0	58.2°	134.9
NEW-T	Gig Harbor	WA	283	D	A	96.7	0.0	62.3°	96.7
ALC	Squamish	BC	284	B		311.8	164.0	8.2°	147.8
CISEFM	Sechelt	BC	284	A		284.0	132.0	358.6°	152.0
ALC	Florence	OR	284	C	U	318.7	188.0	178.6°	130.7
KDUKFM	Florence	OR	284	C	L	293.8	188.0	177.1°	105.8
ALC	Aberdeen	WA	284	C2	U	0.0	130.0	0.0°	-130.0 *1
KDUXFM	Aberdeen	WA	284	C2	L	7.0	130.0	292.7°	-123.0 *1
KDUXFM	Aberdeen	WA	284	C2	L	0.0	130.0	0.0°	-130.0
ALC	Squamish	BC	285	A		311.8	206.0	8.2°	105.8
ALC	Vancouver	BC	285	A		268.8	206.0	9.5°	62.8
ALC	Vancouver	BC	285	C		275.2	274.0	12.1°	1.2
ALC	Abbotsford	BC	285	B		260.3	237.0	25.2°	23.3
CFSRFM	Abbotsford	BC	285	B		260.3	237.0	25.2°	23.3
CISQFM	Squamish	BC	285	A		311.8	206.0	8.2°	105.8
K285DN	Cannon Beach	OR	285	D	L	118.5	0.0	188.4°	118.5
ALC	Wenatchee	WA	285	C2	U	269.5	190.0	79.0°	79.5
ALC	Eatonville	WA	285	A	U	111.6	163.0	93.6°	-51.4 *2
K285CA	North Bend	WA	285	D	A	156.5	0.0	67.6°	156.5
KKBYFM	Eatonville	WA	285	A	L	112.7	163.0	95.3°	-50.3 *2
KKRV	Wenatchee	WA	285	C2	L	273.3	190.0	77.2°	83.3
ALC	Lake Cowichan	BC	286	A		213.8	132.0	353.2°	81.8
ALC	Metchosin etc.	BC	286	A		163.8	132.0	4.2°	31.8
ALC	Salem	OR	286	C	U	239.8	188.0	153.2°	51.8
KKRH	Salem	OR	286	C1	A	179.3	158.0	153.5°	21.3
KKRH	Salem	OR	286	C	L	239.8	188.0	153.2°	51.8
ALC	Edmonds	WA	287	C1	U	139.6	79.0	48.3°	60.6
KCMS	Edmonds	WA	287	C1	L	139.5	79.0	48.3°	60.5
ALC	Longview	WA	288	A	U	109.6	55.0	142.1°	54.6
KLYK	Longview	WA	288	A	A	113.1	55.0	146.6°	58.1
KLYK	Longview	WA	288	A	L	108.7	55.0	141.8°	53.7

1 Allocation to exchange frequencies with KKBY Channel 285
2 Allocation to exchange frequencies.

Job Title: Barbara J. Geesman
Channel: 284C3

Michael Celenza
Communications
FM Separation Study

Exhibit 2
Separation Buffer 160 KM
Coordinates 47-05-46 N
122-12-53 W

Searching Channel 284C3 (104.7 MHz):

CALL	CITY	ST	CHN	CL	S	DIST	SEPN	BRNG	CLEARANCE
ALC	Seattle	WA	231	C	U	48.8	31.0	21.8°	17.8
KMPSFM	Seattle	WA	231	C	L	48.8	31.0	21.8°	17.8
ALC	Yakima	WA	281	C	U	152.8	96.0	115.1°	56.8
K281AD	Olympia	WA	281	D	L	48.2	0.0	264.3°	48.2
KXDD	Yakima	WA	281	C1	L	152.8	76.0	115.1°	76.8
KXDD	Yakima	WA	281	C	C	124.1	96.0	114.8°	28.1
ALC	Tillamook	OR	282	C1	V	223.8	76.0	216.0°	147.8
KTILFM	Tillamook	OR	282	C1	A	223.8	76.0	216.0°	147.8
ALC	Chehalis	WA	282	A	A	75.8	42.0	229.1°	33.8
ALC	Bellingham	WA	282	C	U	182.2	96.0	345.1°	86.2
K282AB	Chehalis	WA	282	D	L	78.0	0.0	226.3°	78.0
KAFF	Bellingham	WA	282	C	L	182.2	96.0	345.1°	86.2
NEW-T	Woodland	WA	282	D	A	137.6	0.0	196.1°	137.6
ALC	The Dalles	OR	283	C	U	175.5	176.0	151.3°	-0.5 *1
KMCQ	The Dalles	OR	283	C	L	175.5	176.0	151.3°	-0.5 *1
KMIH	Mercer Island	WA	283	D	L	52.9	0.0	360.0°	52.9
NEW-T	Gig Harbor	WA	283	D	A	39.8	0.0	312.5°	39.8
ALC	Squamish	BC	284	B		298.4	223.0	346.8°	75.4
ALC	Pender Harbour	BC	284	A		310.0	180.0	334.7°	130.0
CHIMFM	Kelowna	BC	284	C		358.7	259.0	34.1°	99.7
CISEFM	Sechelt	BC	284	A		291.4	180.0	335.8°	111.4
ALC	Florence	OR	284	C	U	354.3	237.0	198.1°	117.3
KDUKFM	Florence	OR	284	C	L	328.1	237.0	198.3°	91.1
ALC	Aberdeen	WA	284	C2	U	116.7	177.0	261.1°	-60.3
KDUXFM	Aberdeen	WA	284	C2	L	122.6	177.0	262.8°	-54.4 *2
KDUXFM	Aberdeen	WA	284	C2	L	116.7	177.0	261.1°	-60.3 *2
ALC	Vancouver	BC	285	A		256.3	113.0	344.5°	143.3
ALC	Vancouver	BC	285	C		256.9	195.0	347.6°	61.9
ALC	Abbotsford	BC	285	B		217.5	149.0	359.3°	68.5
CFSRFM	Abbotsford	BC	285	B		217.5	149.0	359.3°	68.5
ALC	Wenatchee	WA	285	C2	U	153.1	117.0	77.4°	36.1
ALC	Eatonville	WA	285	A	U	25.5	84.0	189.2°	-58.5 *3
K285CA	Snoqualmie Pass	WA	285	D	L	69.8	0.0	59.3°	69.8
K285CA	North Bend	WA	285	D	A	51.1	0.0	35.7°	51.1
KKBYFM	Eatonville	WA	285	A	L	28.7	84.0	186.5°	-55.3 *3
KKRV	Wenatchee	WA	285	C2	L	157.3	117.0	74.3°	40.3
ALC	Metchosin etc.	BC	286	A		177.4	62.0	325.0°	115.4
ALC	Salem	OR	286	C	U	232.3	96.0	182.3°	136.3
KKRH	Salem	OR	286	C1	A	182.4	76.0	191.7°	106.4
KKRH	Salem	OR	286	C	L	232.3	96.0	182.3°	136.3
ALC	Edmonds	WA	287	C1	U	75.5	76.0	352.2°	-0.5 *4
KCMS	Edmonds	WA	287	C1	L	75.5	76.0	352.1°	-0.5 *4

1 Rounds to 176.0 kilometers and is not short spaced by this proposal. See 47 C.F.R. § 73.208 (c).

2 Allocation to exchange frequency.

3 Allocation to move transmitter site.

4 Rounds to 76 kilometer and is not short spaced by this proposal. See 47 C.F.R. § 73.208 (c).

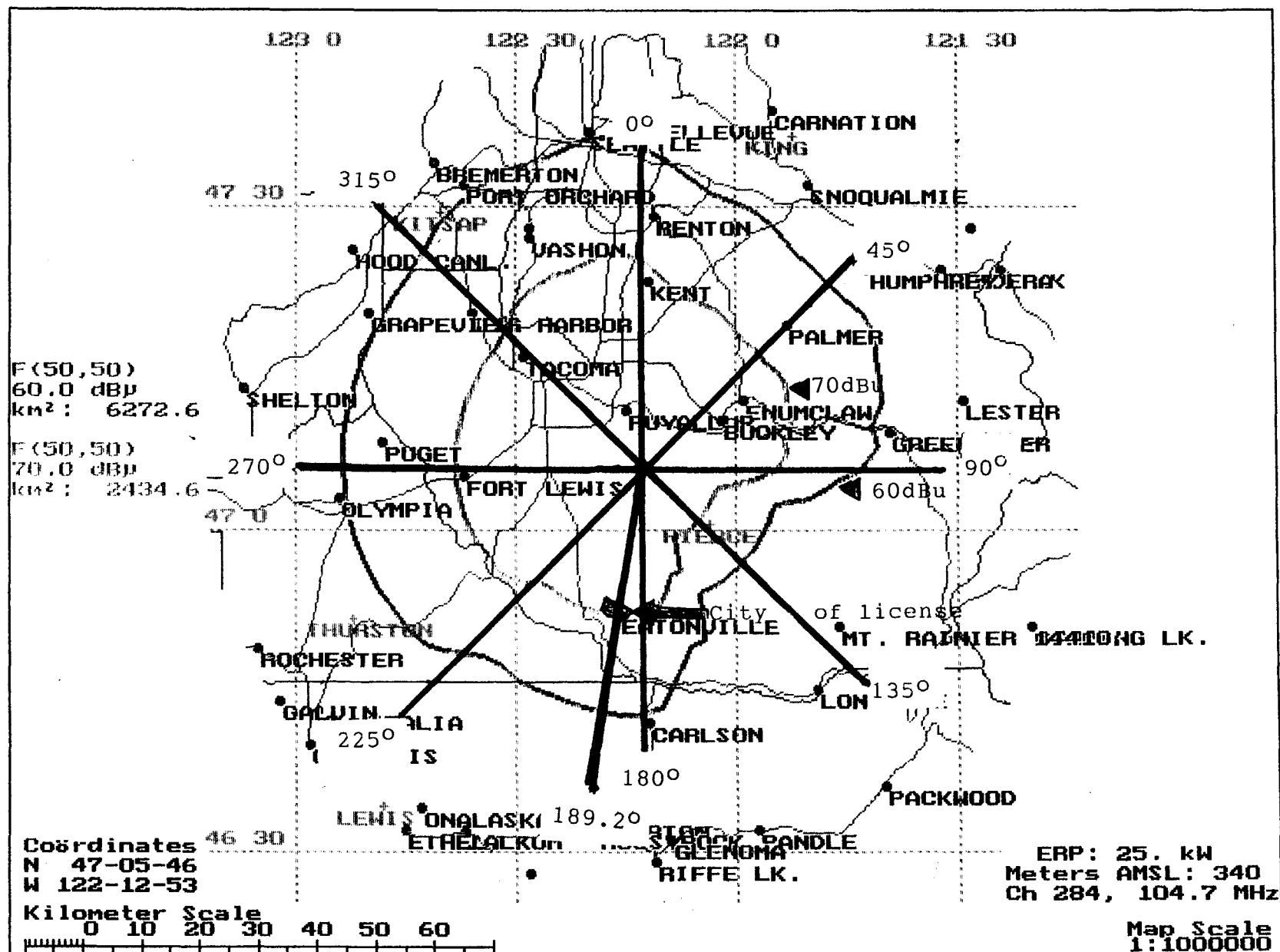


Exhibit # 3

Contour map showing city of license coverage.

Proposed new transmitter site for KKBY FM

CELENZA COMMUNICATIONS

CERTIFICATE OF SERVICE

I, Pamela R. McKethan, hereby certify that on this 9th day of October, 1997, a copy of the foregoing **PETITION FOR RULEMAKING** was mailed, first-class, postage prepaid, to the following:

Peter A. Casciato, Esquire
Peter A. Casciato, A Professional Corporation
8 California Street, Suite 701
San Francisco, California 94111
Counsel for Pioneer Broadcasting Company, Inc.,
Licensee of Station KDUX-FM

Pamela R. McKethan
Pamela R. McKethan